

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff

No. 3:12-CR-224

vs.

Honorable A. Richard Caputo

RICHARD J. HARLEY,

(Electronically Filed)

Defendant

MOTION OF DEFENDANT, RICHARD J. HARLEY, TO EXTEND REPORTING DATE

Defendant, Richard J. Harley, requests that the Court extend his reporting date from November 23, 2015 to November 30, 2015.

The basis for the Motion as set forth in the letter from Mr. Harley to the Court, attached hereto as Exhibit A, is that Mr. Harley's daughter, Tonya, is visiting the Harelys over Thanksgiving and that he would like one last opportunity to spend time with her and his wife.

Respectfully submitted,

/s/ Joseph A. O'Brien, Esquire

Joseph A. O'Brien, Esquire

Attorney for Defendant, Richard J. Harley

Attorney ID: 22103

Oliver, Price & Rhodes

1212 South Abington Road

P.O. Box 240

Clarks Summit, PA 18411

Tel: 570-585-1200

Fax: 570-585-5100

Email: jaob@oprllaw.com

CERTIFICATE OF SERVICE

I, **Joseph A. O'Brien, Esquire**, of Oliver, Price & Rhodes, hereby certify that on the 16th day of November, 2015, I served a true and correct copy of the foregoing MOTION OF DEFENDANT, RICHARD J. HARLEY, TO EXTEND REPORTING DATE which was filed pursuant to the rules of criminal procedure and electronically filed and electronically forwarded to:

Bruce D. Brandler, Esquire
U.S. Attorney's Office
228 Walnut Street
Harrisburg, PA 17108
Email: bruce.brandler@usdoj.gov

Respectfully submitted,

/s/Joseph A. O'Brien, Esquire

Joseph A. O'Brien, Esquire
Attorney for Defendant, Richard J. Harley
Attorney ID: 22103
Oliver, Price & Rhodes
1212 South Abington Road
P.O. Box 240
Clarks Summit, PA 18411
Tel: 570-585-1200
Fax: 570-585-5100
Email: jaob@oprllaw.com

CERTIFICATE OF NON-CONCURRENCE

I, **Joseph A. O'Brien**, hereby certify that U. S. Attorney Bruce Brandler does **not** concur in the MOTION OF DEFENDANT, RICHARD J. HARLEY, TO EXTEND REPORTING DATE.

Respectfully submitted,

/s/Joseph A. O'Brien, Esquire
Attorney for Defendant, Richard J. Harley
Attorney I.D. No.: 22103
Oliver, Price & Rhodes
1212 South Abington Road
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RICHARD J. HARLEY

P.O. BOX 306
SHAWNEE ON DELAWARE, PA. 18356

PHONE: 570-476-6990 FAX: 570-476-1234

November 13, 2015

To the Honorable Judge Caputo:

The Court has ordered that I surrender myself to the US Marshall's on the 23rd day of November, not realizing that Thanksgiving is on the 26th day of November. My daughter Tonya is coming to town to be with her mom and me on thanksgiving I would like to spend time with my family before I have to report. I beg the Courts indulgence and pray that the Court will allow me to report to the US Marshall on Monday November 30, 2015.

Thank you for your kind consideration in this matter.

Respectfully,

Richard Harley

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff

No. 3:12-CR-224

vs.

Honorable A. Richard Caputo

RICHARD J. HARLEY,

(Electronically Filed)

Defendant

ORDER

Now this _____ day of November, 2015 it is hereby ordered that the reporting date for Richard J. Harley is extended to November 30, 2015.

Honorable A. Richard Caputo